

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FILED
IN CLERK'S OFFICE
2006 JUN 14 P 1:31

UNITED STATES OF AMERICA)
vs.) Criminal No. 04-30046-MAP
LAWRENCE LYNCH, et als)
Defendants)

DEFENDANT, LAWRENCE LYNCH'S
MOTION FOR DISCOVERY

Now comes the Defendant, Lawrence Lynch in the above-entitled matter and respectfully requests pre-sentence discovery pursuant to Fed. Rules of Criminal Procedure 16(a)(1)(E), L.R. 116.2(A)(4) and Brady vs. Maryland, 373 U.S. 83 (1963). The Defendant pled guilty in the United States District Court on April 19, 2006 to Wire Fraud and Conspiracy.

Specifically listed in the Wire Fraud was the following property:

1. 617-619 Union Street, Springfield, Massachusetts;

With respect to the Conspiracy the following properties were included:

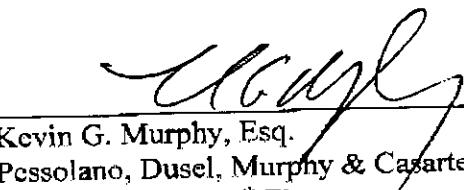
1. 327-329 Bay Street, Springfield, Massachusetts;
2. 125-127 Alderman Street, Springfield, Massachusetts;
3. 838-340 Worthington Street, Springfield, Massachusetts;
4. 62 Kenyon Street, Springfield, Massachusetts;
5. 14-16 Aspen Street, Ware, Massachusetts; and
6. 59-61 Avon Place, Springfield, Massachusetts.

The Defendant respectfully requests the Government provide him with any exculpatory evidence regarding the loss alleged by the Government as a result of loans for these properties.

Further, the Defendant requests any evidence regarding relevant conduct with respect to any other property not previously listed that the Government intends to include in any loss calculation with respect to the Defendant.

WHEREFORE, the Defendant, Lawrence Lynch, respectfully requests the Court order the Government to produce said documents so that the Defendant might properly prepare for sentencing.

RESPECTFULLY SUBMITTED,
By The Defendant,



Kevin G. Murphy, Esq.
Pessolano, Dusel, Murphy & Casartello, PC
115 State Street - 5th Floor
Springfield, MA 01103
Phone (413) 781-4700
Fax (413)781-0471
B.B.O. #363110

CERTIFICATE OF SERVICE

I, Kevin G. Murphy, hereby certify that on this date I caused the foregoing document to be served upon the other party(ies) in this action by faxing and mailing a copy of same, to:

William Welch, Assistant U.S. Attorney
United States Attorney's Office
1550 Main Street
Springfield, MA 01103

Jack St. Clair, Esq.
73 Chestnut Street
Springfield, MA 01103

Moira L. Buckley, Esq.
Shipman & Goodwin, LLP
One Constitution Plaza
Hartford, CT 06106

Gary A. Ensor, Esq.
34 Bridge Street
South Hadley, MA 01075

Vincent A. Bongiorni, Esq.
95 State Street
Springfield, MA 01103

Maria Durant, Esq.
Dwyer & Collora
600 Atlantic Avenue
Boston, MA 01103

Robert Santaniello, Jr., Esq.
Santaniello & Santaniclo
83 State Street
Springfield, MA 01103

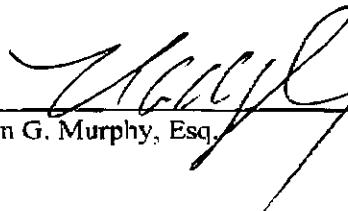
Mark J. Albano, Esq.
Dalsey, Ferrara & Albano
73 State Street
Springfield, MA 01103

Thomas Kokonowski, Esq.
Antonucci & Associates
Stockbridge Street
Springfield, MA 01103

Steven W. Leary, Esq.
95 State Street
Springfield, MA 01103

Michael O. Jennings, Esq.
73 Chestnut Street
Springfield, MA

Dated: June 12, 2006



Kevin G. Murphy, Esq.